



Jeb Bush  
Governor

## Department of Environmental Protection

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David B. Struhs  
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N00204.AR.001916  
NAS PENSACOLA  
5090.3a  
32501.040  
09.01.40.0011

September 15, 2000

Mr. Bill Hill  
Code 1851  
Southern Division  
Naval Facilities Engineering Command  
2155 Eagle Drive  
P.O. Box 190010  
North Charleston, South Carolina 29419-9010

RE: Final Remedial Investigation Report Addendum, Site 40,  
NAS Pensacola

Dear Mr. Hill:

I have completed the technical review of the above referenced document dated April 24, 2000 (received April 25, 2000). I have several general comments below regarding the document.

The purpose of this document was to provide a more detailed risk assessment by evaluating the fish ingestion pathway using site-specific values. The model and approach are generally acceptable and a range of risk values are calculated based on assumptions of different fish ingestion rates and site foraging factors for the recreational and subsistence fisher scenario. The assumptions used for the model ranged from conservative values to more site-specific values based on other published studies. The model presents a risk for most of the model assumptions.

Since tissue from forage fish or other appropriate organisms were not collected and analyzed for mercury, the question remains unanswered whether or not mercury is occurring in fish tissue.

I understand the position of the Navy not to sample fish tissue from game fish like the Red Drum because it may increase uncertainty in the evaluation of risk due to their home range. With that in mind, I would recommend a different approach by collecting forage fish or other

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Mr. Bill Hill  
Page Two  
September 15, 2000

appropriate organisms having a limited home range in the area exhibiting mercury in the sediment and analyzing the tissue for mercury. This site-specific data may reduce the uncertainty in the risk calculations and provide the risk manager with more defensible data on which to base their decisions+

In attachment A, Page 11, it is stated that mercury concentrations could have originated from non-point sources not related to Naval activities. Figure 7-6, Nature and Extent of Mercury, presented in the Site 40 RI errata indicate an area of sediment contamination that is apparently coming from NAS Pensacola.

If I can be of any further assistance with this matter, please contact me at (850) 921-9989.

Sincerely,

Joseph F.

Joseph F. Fugitt, P.G.  
Remedial Project Manager

cc: Ron Joyner, NAS Pensacola  
Gena Townsend, USEPA Region 4  
Tom Dillon, NOAA, WSEPA Region 4  
Brian Caldwell, EnSafe, Knoxville  
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13

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